

REMARKS/ARGUMENTS

Applicants submit this Amendment and Response to the Office Action dated April 18, 2006. Claims 1-3 and 27 have been amended, Claim 38 has been added, and Claim 24 has been canceled without intending to dedicate to the public any patentable subject matter. Accordingly, Claims 1-3 and 20-23, and 25-38 are now pending in the application.

Claims 1-3, 20, 21, and 27-32 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,571,805 to Hoenisch et al. (“Hoenisch”) in view of U.S. Publication No. 2001/0002500 to Kasen et al. (“Kasen”) and further in view of either U.S. Patent No. 5,026,488 to Mesheau (“Mesheau”) or U.S. Patent No. 5,620,309 to Todden et al. (“Todden”). Furthermore, Claims 22-26 and 33-37 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hoenisch, Kasen, and either Mesheau or Todden and further in view of either U.S. Patent No. 5,221,026 to Williams (“Williams”) or U.S. Patent No. 6,705,332 to Field et al. (“Field”). In order to support a prima facie case of obviousness there must be some suggestion or motivation to modify the references or to combine the reference teachings, there must be a reasonable expectation of success, and the prior art reference or references must teach or suggest all of the claim limitations. *MPEP* §2143. However, all of the claim limitations set forth in the pending claims are not found in any of the above mentioned references. Accordingly, reconsideration and withdrawal of the rejections of the claims are respectfully requested.

The only cited reference that discloses a secondary pump is Kasen (see Fig. 4, item 280). The pump priming valve 280 in Kasen is operable to prime pump 112. In order to prime pump 112 the priming valve 280 is connected to a vacuum motor 74. The vacuum motor 74 exerts negative pressure on the fluid outlet of the pump 112 through the pump priming valve 280 in order to draw air out of a pumping chamber between the pump inlets and the solution tanks (Kasen, page 7, paragraph 74, lines 1-7). Many drawbacks to the design of the secondary pump disclosed in Kasen were described in the previous response to the Examiner’s Office Action of December 13, 2005. The Examiner has asserted new art disclosing the use of solenoid priming pumps in various applications. However, the use of such solenoid priming pumps in the architecture taught by Kasen would require a complete redesign of the fluid conduits and valves described in Kasen thereby negating the

teachings of Kasen. Moreover, Kasen does not teach, suggest, or describe having the secondary pump connected to a bypass line where the bypass line provides a connection between the inlet and the outlet of the main pump external to the main pump.

Claim 1 is generally directed to a cleaning machine. As amended, Claim 1 recites in part, “a bypass line in communication with the third fluid delivery line and the outlet of the main pump and a secondary pump in fluid communication with the first fluid delivery line and the bypass line at a point downstream of the inlet of the main pump, wherein the secondary pump is adapted to introduce pressurized fluid into the inlet of the main pump through the bypass thereby displacing trapped gas through the outlet of the main pump and out the high-pressure fluid delivery line.” Support for the claim amendments can be found in the specification, for example on page 34, lines 1-18. Neither Hoenisch, Kasen, Meseau, Todden, Williams, nor Field teach a system wherein a secondary pump supplies pressurized fluid into the inlet of the main pump through a bypass line. Therefore, for at least these reasons, Claim 1 and dependent Claims 2, 3, 20-23, 25, and 26 are not obvious in view of any of the above cited references, and the rejections of Claim 1 and the dependent claims therefrom should be reconsidered and withdrawn.

Claim 27 is also generally directed to a cleaning machine. As amended, Claim 27 recites in part, “a secondary pumping means, which is in communication with the fluid storage tank and the main pumping means, which is adapted to deliver pressurized fluid into the main pumping means via a fluid bypass means that externally connects an inlet of the main pumping means and an outlet of the main pumping means thereby forcing air trapped therein to be expelled.” As noted above, neither Hoenisch, Kasen, Meseau, Todden, Williams, nor Field teach a cleaning machine comprising a secondary pumping means that supplies pressurized fluid into the main pumping means via a fluid bypass means. Therefore, for at least these reasons, Claim 27 and dependent Claims 28-37 are not obvious in view of any of the above mentioned references, and the rejections of Claim 27 and the dependent claims therefrom should be reconsidered and withdrawn.

Claim 38 has been added to include a bypass valve that connects to the outlet of the main pump. The bypass valve can control the flow of fluid either through the main pump and/or around the main pump. Accordingly, fluid can be provided at various pressures to the high-pressure fluid

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delivery line depending upon the position of the bypass valve. Neither Hoenisch, Kasen, Meseau, Todden, Williams, nor Field teach a cleaning machine with a bypass valve connected to the outlet of the main pump that can control the amount of pressure in fluid delivered to a high-pressure fluid delivery line.

Based upon the foregoing, Applicants believe that all pending claims are in condition for allowance and such disposition is respectfully requested. In the event that a telephone conversation would further prosecution and/or expedite allowance, the Examiner is invited to contact the undersigned.

Respectfully submitted,

SHERIDAN ROSS P.C.

By: _____



Matthew R. Ellsworth
Registration No. 56,345
1560 Broadway, Suite 1200
Denver, Colorado 80202-5141
(303) 863-9700

Date: _____

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